

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

HDI GLOBAL SE,  
SWISS RE INTERNATIONAL SE,  
STARR EUROPE INSURANCE  
LIMITED,  
VIENNA INSURANCE GROUP, and QBE  
EUROPE SA/NV, as Subrogees of Currenta  
GmbH & Co. OHG,

C.A. No. 24-878-RGA

Plaintiffs,

v.

FMC CORPORATION,

Defendant.

**STIPULATION AND [PROPOSED] ORDER**

WHEREAS, on September 27, 2024, Defendant FMC Corporation ("Defendant") will file a Motion to Dismiss Plaintiffs' Complaint pursuant to the doctrine of *forum non conveniens* (the "Motion to Dismiss"); and

WHEREAS, the parties have conferred and agreed that the deadline for Defendant to file an Answer to the Complaint shall be deferred until the Court rules on the Motion to Dismiss;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties, subject to the approval of the Court, that:

1. Defendant shall not be required to file an Answer to the Complaint while the Motion to Dismiss is pending for a decision by the Court.
2. By entering into the Stipulation, Defendant does not waive any answer or defenses to the Complaint that it may otherwise assert, and expressly reserves all rights to the same, but Defendant will not be permitted to file a second Motion to Dismiss

under Rule 12(b) of the Federal Rules of Civil Procedure, absent further order of the Court.

3. Defendant shall file its Answer, if necessary, within 21 days of the date the Court issues its decision, unless otherwise agreed to by the parties and/or ordered by the Court.

Date: September 27, 2024

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*Attorneys for Defendant  
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IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

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UNITED STATES DISTRICT JUDGE